

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

JOSE MARIA DeCASTRO,  
a/k/a CHILLE DeCASTRO,  
a/k/a DELETE LAWZ,

Case No. 1:22-cv-11421-ADB

*Plaintiff and Defendant-in-  
Counterclaim*

v.

JOSHUA ABRAMS a/k/a  
ACCOUNTABILITY FOR ALL and  
KATE PETER a/k/a  
MASSHOLE TROLL MAFIA,

*Defendants and Plaintiffs-in-  
Counterclaim, and*

GOOGLE LLC,

*Defendant.*

**MOTION FOR ADMISSION  
PRO HAC VICE OF BENJAMIN D. MARGO**

Pursuant to Massachusetts Local Rule 83.5.3(e), Matthew D. Gorman, Esq., a member in good standing of the bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts, moves Benjamin D. Margo be granted leave to appear in this action *pro hac vice* as counsel for Defendant Google LLC. In support of this motion, and based on the representations set forth in the attached Declaration of Benjamin D. Margo (Exhibit 1), Mr. Gorman states as follows:

1. Benjamin D. Margo is an associate at Wilson Sonsini Goodrich & Rosati, P.C., 1301 Avenue of the Americas, 40th Floor, New York, New York 10019.
2. Mr. Margo is a member in good standing of the bars of New York, California, the District of Columbia, and every jurisdiction where he is admitted to practice.

3. There are no disciplinary proceedings pending against Mr. Margo as a member of the bar in any jurisdiction.

4. Mr. Margo has not previously had a *pro hac vice* admission to this court (or other admission for a limited purpose under this rule) revoked for misconduct.

5. Mr. Margo has read and agrees to comply with the applicable provisions of the Local Rules of the United States District Court for the District of Massachusetts.

WHEREFORE, Mr. Gorman respectfully requests that his Motion to Admit Benjamin D. Margo *pro hac vice* be allowed.

Dated: May 23, 2023

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

/s/ Matthew D. Gorman  
Matthew D. Gorman (BBO #569406)  
28 State Street, 37th Floor  
Boston, Massachusetts 02109  
Telephone: (617) 598-7800  
Facsimile: (866) 974-7329  
Email: mgorman@wsgr.com

*Counsel for Defendant Google LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that this document was filed through the District of Massachusetts CM/ECF system and will be sent electronically to all registered participants as identified on the Notice of Electronic Filing (“NEF”) and paper copies will be sent to those indicated as non-registered participants.

Dated: May 23, 2023

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

*/s/ Matthew D. Gorman*

Matthew D. Gorman (BBO #569406)  
28 State Street, 37th Floor  
Boston, Massachusetts 02109  
Telephone: (617) 598-7800  
Facsimile: (866) 974-7329  
Email: mgorman@wsgr.com

*Counsel for Defendant Google LLC*